

From: [Delsesto, David \(DEM\)](#)
To: [Bird, Patrick](#)
Cc: [St. Amand, Stephen \(DEM\)](#)
Subject: RE: [EXTERNAL] : FW: Public concerns regarding location MED RECYCLER Facility being proposed for 1600 Division Road, West Warwick
Date: Thursday, March 11, 2021 1:37:40 PM
Attachments: [image003.jpg](#)

Hi Pat

FYI Ruth is officially retired!

We have received this complaint as well. The permit was reviewed and issued back in May 2020. Medrecycler had to apply for a waste permit as well. The waste permit is currently in the public comment phase. If that permit is denied the facility will not be able to operate.

Based on OAR's BACT analysis, the facility was designed with several control devices to control syngas emissions. The APC control train consists of gas clean up system (consisting of tar condenser, oil condensing scrubber and dosing scrubber), cyclones, RTO and emergency flare. This system is a closed loop system. Other like facility that utilize pyrolysis do not have this level of control on their systems.

Once the RTO is started they will have 180 days to perform a stack test to determine compliance with the emission limitations specified in the permit. Below is a list of all Air toxics they will have to show compliance with:

fluorides, sulfuric acid, hydrogen sulfide, acetaldehyde, benzene, 1,3-butadiene, chlorine, formaldehyde, hydrogen chloride, hydrogen fluoride, hydrogen cyanide, naphthalene, methyl chloride, toluene, vinyl chloride, xylene, antimony, arsenic, beryllium, cadmium, chromium III, chromium VI, cobalt, copper, lead, manganese, mercury, molybdenum, nickel, selenium, vanadium, zinc, Polychlorinated Dibenzo Dioxins (PCDDs), Polychlorinated Dibenzo Furans (PCDFs), Polychlorinated Biphenyls (PCBs), Polycyclic Organic Matter (POMs)

If the facility stack testing shows that any of the pollutants listed above, exceed the minimum quantities then the facility will have to run air modeling and the preconstruction permit will be revised with the results from air modeling.

If you need any other information or have questions please feel free to contact myself or Steven St. Amand

Have a nice day.

David DelSesto, Acting Supervising Air Quality Specialist
Rhode Island Department of Environmental Management
Office of Air Resources – Permitting
235 Promenade Street, Providence, RI 02908
Email: david.delsesto@dem.ri.gov
Phone: (401) 222-2808 x 77048



From: Bird, Patrick <Bird.Patrick@epa.gov>
Sent: Thursday, March 11, 2021 11:30 AM
To: Gold, Ruth (DEM) <ruth.gold@dem.ri.gov>; Delsesto, David (DEM) <david.delsesto@dem.ri.gov>
Cc: Lancey, Susan <lancey.susan@epa.gov>
Subject: [EXTERNAL] : FW: Public concerns regarding location MED RECYCLER Facility being proposed for 1600 Division Road, West Warwick

Hi Ruth and Dave,

We received an inquiry from a concerned citizen about the proposed Medrecycler facility. What is the status of the air permit application? Also, as you can see below, the concerned citizen is wondering how this project fits within your air toxics program review. Any information you can provide to me on this would be much appreciated.

As an FYI, our solid waste office is following up with RI DEM on this, too.

Thanks,

Pat

From: Denise Lopez <denisealopez35@gmail.com>

Sent: Thursday, March 11, 2021 10:17 AM

To: Bird, Patrick <Bird.Patrick@epa.gov>

Cc: Lancey, Susan <lancey.susan@epa.gov>

Subject: Re: Public concerns regarding location MED RECYCLER Facility being proposed for 1600 Division Road, West Warwick

Hi Pat,

Thank you. One additional concern that was raised was whether any consideration had been given to an Air Toxics Permit in addition to the Minor Air Source Permit for the Medrecycler project based on the following (page 15 of DEM Air Toxics doc below) ...

V. Prioritization of Sources for Requiring Air Toxics Operating Permits

2. Consideration of other factors may shift a source to a higher priority position. Such factors include, but are not limited to:

- Neighborhood concern about odors and/or health impacts
- Proximity of the source to other sources emitting air toxics
- Proximity of the source to residential areas, schools, or other sensitive receptors
- Uncertainty about emissions calculations
- Elevated short-term emissions of a substance with a one-hour or 24-hour AAL

<http://www.dem.ri.gov/programs/benviron/air/pdf/airtoxgl.pdf>
[\[gcc02.safelinks.protection.outlook.com\]](http://gcc02.safelinks.protection.outlook.com)

Thanks again, in advance, for any additional assistance, oversight you can provide.

Best Regards,

Denise Lopez

On Thu, Mar 11, 2021 at 9:14 AM Bird, Patrick <Bird.Patrick@epa.gov> wrote:

Hi Denise,

It has been some time since my group has fielded questions on this proposed facility. However, I am coordinating with our solid waste group and with Rhode Island DEM to determine the status of the project.

I will follow up with you shortly.

Pat

Patrick Bird

US EPA Region 1
5 Post Office Square, 05-2
Boston, MA 02109
p: 617-918-1287
e: bird.patrick@epa.gov

From: Denise Lopez <denisealopez35@gmail.com>

Sent: Monday, March 8, 2021 8:50 PM

To: Bird, Patrick <Bird.Patrick@epa.gov>

Cc: Lancey, Susan <lancey.susan@epa.gov>

Subject: Re: Public concerns regarding location MED RECYCLER Facility being proposed for 1600 Division Road, West Warwick

Good Evening Mr Bird,

I wanted to follow up on our conversations from last year as concerns among the community are continuing to grow as the public comment for the solid waste permit with DEM is coming up on Monday, 3/15. Has your area provided any additional oversight on the application since last year? Thanks in advance for any information you can provide.

Best Regards,

Denise Lopez

On Thu, Mar 26, 2020 at 12:48 PM Bird, Patrick <Bird.Patrick@epa.gov> wrote:

Hi Denise,

I certainly don't want you to feel like we're giving you the runaround. But much of the opportunity for public participation will occur at the state level. To date, no permits have been proposed for this facility, and the state is still evaluating applications. I encourage you to reach out to the state contacts and learn where they are in their review process.

Pat

Patrick Bird

U.S. EPA - Region 1

5 Post Office Square, 05-2

Boston, MA 02109-3912

Phone: 617-918-1287

Fax: 617-918-0287

Email: bird.patrick@epa.gov

From: Denise Lopez <denisealopez35@gmail.com>

Sent: Thursday, March 26, 2020 11:55 AM

To: Bird, Patrick <Bird.Patrick@epa.gov>

Cc: Lancey, Susan <lancey.susan@epa.gov>

Subject: Re: Public concerns regarding location MED RECYCLER Facility being proposed for 1600 Division Road, West Warwick

Thank you. The irony is RI DEM is actually the one who told me to reach out to you.

Thank you for the additional parties to reach out to. I just hope that someone is taking this seriously and not just sending me from one place to another with no answers.

Best,

Denise Lopez

Sent from my iPhone

On Mar 26, 2020, at 11:03 AM, Bird, Patrick <Bird.Patrick@epa.gov> wrote:

Ms. Lopez,

We appreciate you reaching out to us regarding the Medrecycler facility proposed to be constructed in West Warwick, Rhode Island. We have been coordinating with the Rhode Island Department of Environmental Management (RI DEM) about this proposed facility. RI DEM is reviewing the proposed facility with respect to all applicable state air quality, solid waste, and wastewater regulations, as well as delegated federal regulations. We are working with RI DEM in reviewing applicable requirements that apply to the proposed facility.

RI DEM has the primary responsibility to issue any air quality, solid waste, and wastewater permits required for this operation. We encourage you to contact RI DEM directly regarding your questions about permitting approvals that are required and opportunities for the public to provide input. The contact at RI DEM for air questions is Ruth Gold at 401-222-2808 extension 7110 or ruth.gold@dem.ri.gov, the contact for solid waste questions is Mark Dennen, at 401-222-2797 extension 7112 or mark.dennen@dem.ri.gov, and the contact for wastewater questions is Nicholas Pisani at 401-222-4700 extension 7423 or nicholas.pisani@dem.ri.gov.

In addition to state regulatory requirements, we encourage you to contact the local planning board and other local offices regarding their requirements and opportunities for public input at the local level. Please contact Mark Carruolo at 401-827-9025 in West Warwick for questions about requirements at the local level.

Pat
Patrick Bird
U.S. EPA - Region 1
5 Post Office Square, 05-2
Boston, MA 02109-3912
Phone: 617-918-1287
Fax: 617-918-0287
Email: bird.patrick@epa.gov

From: Denise Lopez <denisealopez35@gmail.com>

Sent: Thursday, March 19, 2020 10:49 AM

To: Lancey, Susan <lancey.susan@epa.gov>

Cc: Bird, Patrick <Bird.Patrick@epa.gov>

Subject: Re: Public concerns regarding location MED RECYCLER Facility being proposed for 1600 Division Road, West Warwick

Thank you . As you can see from the aerial pic below , although the facility is technically being proposed for West Warwick it is right on the EG line near

residential areas , New England Tech as well as a day care .

There are many concerns including..

- How close should this be to a preschool / daycare and residential homes (see aerial view below)? Although technically in West Warwick is right on EG line near residential area as well as abutting Coventry , West Warwick .
- are there requirements for filters on any air stacks ?
- how is this plant cleaned and how often ?
- wastewater concerns as this property is on a pond and in a well water area .
- will this be regulated by the Clean Air Act ?
- there has been NO safety planning committee produced and even the R.I. DEM seemed concerned with little to no testing being done on such experimental technology.

Thank you again and look forward to hearing from you .

Best Regards ,

Denise Lopez

<image001.jpg>

Sent from my iPhone

On Mar 18, 2020, at 2:00 PM, Lancey, Susan

<lancey.susan@epa.gov> wrote:

Thank you for your message. We will look into your questions and get back to you soon.

Susan Lancey

U.S. EPA New England

5 Post Office Square

Suite 100 (Mail Code: 05-2)

Boston, MA 02109

Phone: (617) 918-1656

From: Denise Lopez <denisealopez35@gmail.com>

Sent: Tuesday, March 17, 2020 11:14 AM

To: Bird, Patrick <Bird.Patrick@epa.gov>; Lancey, Susan

<lancey.susan@epa.gov>

Cc: stephen.stamand@dem.ri.gov

Subject: Public concerns regarding location MED RECYCLER Facility being proposed for 1600 Division Road, West Warwick

"A relatively untested technology that cooks medical waste to generate electricity is proposed for a local office and warehouse building."

[https://www.ecori.org/renewable-energy/2020/2/23/ck9nv4mw8075yzszrdvy2tb3ep2xe5?fbclid=IwAR38milruzHw0rdYR161WSm3jaaBWoe2pl7G4ywMy21Kkx076mpgqMji0-A\[gcc02.safelinks.protection.outlook.com\]](https://www.ecori.org/renewable-energy/2020/2/23/ck9nv4mw8075yzszrdvy2tb3ep2xe5?fbclid=IwAR38milruzHw0rdYR161WSm3jaaBWoe2pl7G4ywMy21Kkx076mpgqMji0-A[gcc02.safelinks.protection.outlook.com])

" The Conservation Law Foundation (CLF) has noted that emissions from

pyrolysis contain cancer-causing compounds. The ash consists of dioxins, mercury, and heavy metals — pollutants that can make their way into waterways and drinking water supplies. The applications submitted to DEM says the facility will emit or have as byproducts carbon dioxide, carbon monoxide, silicon dioxide, magnesium oxide, iron oxide, sodium chloride, and sodium sulfide"

As an East Greenwich resident this is NOT something I want close to my home .

I am writing to register my concern regarding the permit approval for the proposed Med Recycler site for 1600 Division Rd. This facility is very close to the residential area where I live , Signal Ridge, as well as many of the homes here are on well water. In fact, I have already seen that the "MED RECYCLER" name has been added to the 1600 Division Rd sign which seems a bit premature.

The petition below further elaborates community concerns as in less than 2 days it has gotten 600 signatures (and counting) representing how alarmed the community is with this project. It was also request that West Warwick and Coventry residents be added as they also have issue with the facility in a residential community.

[https://www.change.org/p/west-warwick-town-council-stop-proposed-med-recycler-site-for-1600-division-rd-approval/u/25946141](https://www.change.org/p/west-warwick-town-council-stop-proposed-med-recycler-site-for-1600-division-rd-approval/u/25946141?gclid=Cj0KCQj1jY3nBhDARiAWhgEaA0100000000&gclsrc=aw.ds) [gcc02.safelinks.protection.outlook.com]

I would like additional information on where this stands with EPA approval and when the public will be able to weigh in with their concerns regarding the location.

Thank in advance for your consideration. I look forward to hearing from you .

Denise Lopez